

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Dante Harris		CHAPTER 13
	<u>Debtor</u>	
Toyota Lease Trust		
	<u>Movant</u>	
vs.		NO. 17-15554 MDC
Dante Harris		
	<u>Debtor</u>	
William C. Miller Esq.		11 U.S.C. Section 362
	<u>Trustee</u>	

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearages referenced in the motion have been cured, and Debtor(s) is/are current on post-petition loan payments through September 5, 2018.
2. The lease for the Vehicle, 2015 TOYOTA CAMRY, VIN: 4T1BF1FK4FU035837, matures on November 5, 2018.
3. Debtor will make the final lease payment for the Vehicle on or before November 5, 2018.
4. Therefore, that the automatic stay will be hereby terminated on November 5, 2018 under 11 U.S.C. Sections 362 (d) and 1301 (if applicable) as to Movant to permit said creditor, its successors and/or assigns to take possession and sell, lease, and otherwise dispose of the 2015 TOYOTA CAMRY, VIN: 4T1BF1FK4FU035837 in a commercially reasonable matter.
5. The stay provided by Bankruptcy Rule 4001(a)(3) is waived with respect to any Court Order approving of this stipulation and/or ordering relief per the terms agreed upon herein.
6. If the case is converted to Chapter 7, the Movant shall file a Certification of Default with the court and the court shall enter an order granting the Movant relief from the automatic stay.
7. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

8. The provisions of this stipulation do not constitute a waiver by the Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the vehicle, loan, and applicable law.

9. The parties agree that a facsimile signature shall be considered an original signature.

Date: October 11, 2018

By: /s/ Kevin G. McDonald, Esquire
Kevin G. McDonald, Esquire
KML Law Group, P.C.

Date: 10-26-18

[Signature]
Zachary Perlick, Esquire
Attorney for Debtor

Date: 10/29/18

[Signature]
William C. Miller, Esquire
Chapter 13 Trustee
***without prejudice to any trustee rights or remedies**
NO POSITION

Approved by the Court this 30th day of October, 2018. However, the court retains discretion regarding entry of any further order.

[Signature]

Bankruptcy Judge
Magdelaine C. Coleman